

Commenter
350 Colorado, Green Cities Coalition, Sierra Club Colorado, Pikes Peak Justice and Peace Commission, (Includes 450 signatures from citizens)
Alan J. Goin - former employee of CSU
Anonymous - citizen of Colorado Springs
Anonymous - professional of environmental/soci al/financial sciences at an institute of higher education
Anonymous

Anonymous

Anonymous

Anonymous

Jacquie Ostrom

Leslie Weise

S. Masias et al.
Susan Permut - citizen in El Paso County

We are writing to request that EPA re-evaluate its recommendation to designate the Martin Drake Plant in El Paso County Colorado as unclassifiable. Air quality professionals showing that violations of this air quality regulation caused by the coal burning power generation from the Martin Drake Plant have not obtained compliance with the Standard, while knowingly and willingly prolonging the amount of time over one half million people continue to live with.

Most importantly, when compared to the broader Colorado Springs community, the people living within a three-mile radius of this downtown area are disproportionately low-income and minority. The pollutants from the Martin Drake plant have a disproportionate effect on these low-income and minority communities, those vulnerable populations protected by the NAAQS regulation, which is to protect vulnerable populations from short-term (as little as 5 minute) exposure to harmful levels of SO₂.

The EPA must acknowledge that the best available data concerning SO₂ levels in El Paso County from the Martin Drake Plant shows violations of the predicted performance of SO₂ removal scrubbers, show continued violations of the NAAQS. In fact, CDPHE even found non-attainment when the plant was designated (See record of the October 2015 hearing of the Colorado Air Quality Control Commission).

Rather than take proactive measures to protect public health over the four years after it first learned of the NAAQS violations in this region, the EPA has designated the plant as unclassifiable - in effect a request for even more time to ignore the pollution violations. The EPA must not support this neglect of this plant, from EPA and the public. (See El Paso County District Court Petition filed against the City of Colorado Springs on January 21, 2016).

I urge the EPA to change its designation of El Paso County, Colorado regarding NAAQS and the SO₂ Standard, from 'unclassifiable' to 'non-attainment'.

We look to the EPA to:

- Prioritize the health and safety of people and the environment over the convenience of industry and government regulators,
- Avoid playing politics with matters of public health and safety, particularly when low income and minority populations are disproportionately affected,
- Promote the transparency of information from our government regulators, and
- Defer to the best available scientific data collected, not the conjecture and inadequate presentation made on this topic by CDPHE.

Thank you for the opportunity to provide comment on this important matter. A designation of non-attainment for SO₂ is the only way to a

For years, the local utilities monitored the ambient SO₂ standard at ground level. Never was the area close to exceeding the standard. With careful consideration should be given to additional monitoring by the local utility before such a designation is made. I oppose the designation.

As a concerned and involved citizen of Colorado Springs I'm writing to request the EPA change the designation in regard to sulfur dioxide emissions from the Martin Drake Power Plant in Colorado Springs. I have been following this situation for several years and know that this plant needs consistent, objectives monitoring to be proven with

I am writing to express my concern regarding the potential designation of the Martin Drake Power Plant in Colorado Springs, CO as an "unclassifiable" facility. Such a designation would be tantamount to negligence and will potentially mire Colorado Springs Utilities, CDPHE, and EPA in further legal battles. I am writing to express my concern regarding the potential designation of the Martin Drake Power Plant in Colorado Springs, CO as an "unclassifiable" facility. Furthermore, given that the EPA is tasked with protecting the public's health and safety, the culpability of effects from the plant's emissions are out of compliance with NAAQS and therefore would be negligent in recommending that the facility be designated as "unclassifiable". CDPHE has already demonstrated their intent to ignore the health impacts to the citizens they are charged with protecting by these effects. CDPHE has already demonstrated their intent to ignore the health impacts to the citizens they are charged with protecting by these effects. Granting the facility permission to harm our citizens for a minimum of two more years in order to demonstrate compliance at the Martin Drake Power Plant as ample time has been allotted to comply with NAAQS. EPA needs to act in the

I live in Colorado Springs, CO. I have recently observed that we have a small minority of residents who wish to push for tighter SO₂ regulations. Please do NOT be influenced by this radical group of individuals!

Overwhelming modeling and analysis results indicate that El Paso County, Colorado, is in Non-Attainment of the 2010 National Ambient Air

Rigorous modeling performed in accordance with EPA standards submitted by the Sierra Club, Wingra Associates, and other reputable modeling meteorological station at the Colorado Springs Municipal Airport, approximately seven miles from Drake, with no significant intermediate

The primary counter argument posed by Colorado Springs Utilities (CSU) and accepted by the Colorado Department of Public Health and Environment historical data shows an extremely strong correlation between the two sites for temperature, precipitation and relative humidity. There is In the modeling, such a directional difference is actually more conservative, as east winds would tend to increase SO2 concentrations again violations.

Two other points should be critical to the EPA decision process:

1. If CSU has had a concern over the representative nature of airport meteorological data, they should have built an on-site meteorological available, and representative data between 2010 and 2015 is the airport data. The EPA should not reward CSU for intentional delaying and
2. The default position of the EPA should always be the protection of the public and the utility. All of the best available modeling using reports thousands of Pikes Peak Region citizens.

The only clear and responsible action for the EPA to take at this time is to declare El Paso County Colorado to be in "Non-Attainment" of the

Prioritize the health and safety of people and the environment over the convenience of industry and government regulators, Avoid playing information from our government regulators, and Defer to the best available scientific data collected, not the conjecture and inadequate r and necessary action to stop harmful SO2 emissions, and provide sufficient oversight to protect public health to ensure the air we breathe

With the latest news of Wild Earth Guardians filing a lawsuit against Colorado Springs Utilities over multiple violations of the Clean Air Act decades now. Clearly El Paso County is a NON-ATTAINMENT area! EPA, please protect the citizens!

Reasons why El Paso County, Colorado, is in Non-Attainment of the 2010 SO2 National Ambient Air Quality Standards.

- 1) Atmospheric Scientist from NCAR states:

"I am aware of the region's climatology and terrain. It appears obvious to me that when the wind blows from the east and emissions from There is no reasonable scientific justification to avoid the conclusion that the air quality is out of compliance with our Clean Air standards. Describing this region as unclassifiable is cowardly and scientifically dishonest."

<https://www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2014-0464-0001>

- 2) CDPHE and CSU have never placed any physical monitors in the foothills on the west side of Colorado Springs, exactly where multiple pr
- 3) Even after CDPHE made changes to the Sierra Club modeling of SO2 in the Pikes Peak region, and CDPHE used parameters more to their
- 4) Even with the SO2 scrubbers installed on the Martin Drake Plant, the professional models show we can expect more than five minute sp
- 5) The sense of the public in El Paso County is that Colorado Springs Utilities and CDPHE are in collusion providing the EPA only the informa provided to anyone and many have asked. Why? We can only suspect that it would show Non-attainment. But also, CDPHE stated in a mee much they run the aged Martin Drake Coal Fired Power Plant. These are not good reasons for an Unclassifiable designation.

In Summary we, who live under the pollution from this plant, need the protection of the EPA to stand up with us the citizens to designate M data analyses that show clear and certain risk to our region due to SO2 violations.

We need the EPA to enforce closer monitoring of not only the SO2 in our air but also closer monitoring of CDPHE and CSU. Designate this r

4 pages of the comment - read downloaded file in folder

Document
Air Expertise Colorado
CSU
Environemental Defense Fund
Environemental Defense Fund - Attachment A - Dr. Gray

Leslie Weise letter to EPA
Leslie Weise WildEarth Guardians Intent to Sue
Leslie Weise Sam Masias Letter to EPA

These analyses together provide full support and evidence for a designation of nonattainment for the 1-hour SO₂ NAAQS for an approximate 10-mile radius around the Martin Drake plant. Airport meteorological data are fully representative of conditions at the Martin Drake plant.

Files can be found:

ftp.airexpertisecolorado.com

u/n = mbarrett@airexpertisecolorado.com

p/w = Springs2014

Air quality monitoring throughout El Paso County at numerous monitoring stations from 1988 through the present has consistently shown that the area is in attainment of the 1-hour SO₂ NAAQS. Colorado Springs Utilities voted to decommission Drake Unit 5 no later than December 31, 2017.

Limit the unclassifiable area to the City of Colorado Springs west of Academy Blvd.

Ongoing meteorology supports the EPA's and CDPHE's meteorological determinations and the unclassifiable designation within Colorado Springs.

Wind roses from the end of October, 2015, and a copy of Figure 3, from the EPA's Technical Support Document, show that wind directions at the airport are generally from the south/southwest orientation (right wind rose), while winds at the airport show a north/south orientation (left wind rose). This supports the conclusion that the area is in attainment of the 1-hour SO₂ NAAQS.

Neither the State of Colorado nor EPA conducted any modeling to support this proposed classification; rather, the determination appears to be based on "the area surrounding the Martin Drake Power Plant" that can be used for AERMOD modeling. EPA has thus proposed to reject two independent modeling studies as a sufficient basis to support the proposed classification.

Attached expert report by Dr. Andrew Gray, modeling demonstrates that the area surrounding the Martin Drake Power Plant must be designated as unclassifiable because that emissions from the Martin Drake Power Plant are causing air quality impacts that are grossly above the acceptable level of the 1-hour SO₂ NAAQS, even when one assumes a background concentration of zero. The Colorado Springs surface hourly and one-minute data, combined with the upper air data (morning soundings) from the Denver Airport, are not usable for modeling SO₂ emissions from the Martin Drake Power Plant.

The Meteorological Data Used to Model the SO₂ Design Values is Appropriate. Two researchers, Klafka⁹ and Barrett,¹⁰ performed independent dispersion modeling using the AERMOD modeling system to assess the air quality impacts from the Martin Drake Power Plant. Klafka used a newer version of AERMOD, applied urban dispersion coefficients and building downwash, and different stack heights), both models showed that the area is in attainment of the 1-hour SO₂ NAAQS. The other factors identified by EPA for rejecting the Klafka model are not a basis for the "unclassifiable" designation.

The Colorado Springs surface hourly and one-minute data, combined with the upper air data (morning soundings) from the Denver Airport, are not usable for modeling SO₂ emissions from the Martin Drake Power Plant. AERMOD model results, using meteorological data from the Colorado Springs Airport, demonstrate that emissions from the Martin Drake Power Plant are causing air quality impacts that are grossly above the acceptable level of the 1-hour SO₂ NAAQS, even when one assumes a background concentration of zero. APCD's observation that wind patterns near the Martin Drake facility include many more lower wind speed periods than at the Colorado Springs Airport supports the conclusion that the area is in attainment of the 1-hour SO₂ NAAQS.

Independent review of two modeling exercises in which air quality impacts were estimated due to sulfur dioxide emissions from the Martin Drake Power Plant. APCD's claim that the meteorological data from the Colorado Springs Airport is not usable for modeling SO₂ emissions from the Drake power plant is not supported by the data. The data represent a reasonable data set for modeling with AERMOD. It is also clearly appropriate to include building downwash effects in the modeling. The data from the Martin Drake facility are not particularly sensitive to the meteorological data used with respect to the attainment analysis.

AERMOD model results, using meteorological data from the Colorado Springs Airport, demonstrate that emissions from the Drake facility are causing air quality impacts that are grossly above the acceptable level of the 1-hour SO₂ NAAQS, even when one assumes a background concentration of zero. APCD's observation that wind patterns near the Drake facility include many more lower wind speed periods than at the Colorado Springs Airport supports the conclusion that the area is in attainment of the 1-hour SO₂ NAAQS.

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Four professional modeling analyses by two independent professional air quality services firms all show non-- - attainment of SO2 NAAQS Utilities (CSU) and EPA during the period of 2012 to December 2015. All four analyses were carefully conducted within EPA procedures and CDPHE chose to ignore the three professional analyses presented to them...Rather than base its recommendation to AQCC or the EPA on p 2011. These notes present a casual observation of how well meteorological data from the Colorado Springs Airport could pertain to the air assessment, the (now former) employee took no measurements or solicited actual data to form his beliefs, nor were the thoughts converted

On October 15, 2015 before AQCC, CDPHE testified that even after adjusting certain modeling parameters to its preference from those that CDPHE and CSU also regularly publicly state that the sole SO2 monitor in the Region shows compliance of the SO2 NAAQS. In contradiction Martin Drake Power Plant, and further omits explanation that a sole monitor can never be relied upon for a thorough NAAQS compliance c

Finally, it has also been found through an Open Records request to Colorado Springs Utilities that invoices were submitted to it by its air quality timing and that the contract under which this work was performed by AECOM explicitly relates to air quality modeling and NAAQS compliance quality information is believed to be in violation of the Colorado Open Records Act (CORA) and Clean Air Act, I have filed a Petition to the

Notice that WildEarth Guardians intends to Colorado Springs Utilities for significant and ongoing violations of the Clean Air Act at the coal-

Studied the demographics of the community surrounding the Martin Drake coal fired power plant in the heart of Colorado Springs downtown city.

Commenter	State
Southern Illinois Power Cooperative	Illinois
John Blair	Indiana
Stephen J. Jay	Indiana
Anonymous	Indiana
M. Hirschland	Indiana
Mark Bryant	Indiana

Lee Meadows	Maryland
Anonymous	Maryland
Heather Didonato	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Ronni Allen	Maryland
Mary Lee Zetter	Maryland
Renee Fernandez	Maryland

Walter Smith	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Maryland
Anonymous	Missouri
Anonymous	Missouri
Gerry & Jerry Friedman	Missouri
Carol Nohl	Missouri
Anonymous	Missouri

Janet Dittrich	Missouri
Richard Orr	Missouri
Jeanne Clauson	Missouri
P. Govindaswamy	Missouri
Anonymous	Missouri
Anonymous	Missouri
Anonymous	Missouri
Anonymous	Missouri
Anonymous	Missouri
Christine Alt	Missouri

Anonymous	Missouri
Patricia Schuba	Missouri
Lisa Zerbe	Missouri
Joseph T. Brazil	Missouri
Anonymous	Missouri
Chrissy Mann - Sierra Club	Texas
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Designation Recommendations for the 2010 Sulfur Dioxide National Ambient Air Quality Standard (Subject to Review and Approval by EPA) and Illinois Environmental Protection Agency for review.

The Marion Power Plant, located in Williamson County, IL and owned and operated by the SIPC, is one of the sources affected by the SO₂ C response to the Illinois EPA designation recommendations. The updated dispersion modeling analysis was conducted for the latest 3 years controls associated with MATS and CSAPR. The AERMOD modeling was conducted using the current regulatory defaults in one set of runs, AERMOIST was used as part of the refinements to more accurately model the plume rise effect caused by moisture in a scrubbed stack's plume to the 1 hour SO₂ National Ambient Air Quality Standard. With this new information, we request that EPA revise their proposed designation of

I am asking that you thoroughly review the modeling inputs, parameters and source code used by the state to supposedly show attainment. The shenanigans have taken place with IDEM's modeling in the past where IDEM employees slightly changed the source code of a model to achieve a power plant in 1999. (Please see attached document from Valley Watch issued at that time.)

We implore you to closely review IDEM's model to see if similar manipulation of the data inputs occurred in IDEM's submissions across Indiana. Further, we would like to point the fact that in all the cases we looked at, there was almost zero margin of error even after IDEM suggested. NAAQS require a reasonable margin of safety, it seems to follow that new emissions limits suggested by the state should also not be so close and 24 hour standards for fine particles which do result from SO₂ emissions at power plants.

We do understand that the various utilities, Duke, Energy, Vectren and Indiana Kentucky Electric Corp. have invested money into scrubbers. Higher standards would present increased cost for the energy they produce but the fact remains that these areas in particular have very large communities surrounding area.

The use of models, which have likely been altered to gain satisfactory results should never be allowed to replace actual data.

In the case of AB Brown in Posey County, others have modeled current emissions and determined that emissions limits substantially lower than the current ones. Therefore, we ask that EPA take a serious and protracted investigation and review of the use of modeling at IDEM that is designed only to

Thanks for your consideration in this matter and we look forward to reviewing EPA's review of this serious issue prior to EPA granting attainment. I urge EPA to designate Gibson County, Indiana as non-attainment for sulfur dioxide (SO₂) pollution because overwhelming evidence demonstrates

harmful levels of SO₂ pollution, even for very-short time periods, can cause serious health problems. I demand clean air in Indiana.

Air modeling performed by the State of Indiana shows that actual emissions from the Gibson plant for 2012 to 2014 cause exceedances of the SO₂ standard set at 75 ppb. Sierra Club performed its own air modeling that confirms that the Gibson plant causes violations of the SO₂ standard.

Gibson is a massive coal-burning plant and its scrubbers simply do not seem to be operating effectively. In 2014, for example, Gibson's SO₂ emissions rate was 0.254 lbs. SO₂/MMBTU. State-of-the-art scrubbers can achieve much lower, even at a retrofitted coal plant. Whatever Duke is doing to control SO₂ at Gibson, it is not as effective as can be achieved and nearby people deserve.

We urge that EPA take prompt action to remedy the SO₂ pollution problem in Gibson County. As a practicing pulmonologist I am aware that SO₂ pollution can cause serious health problems, even for very-short time periods, can cause serious health problems. I demand clean air in Indiana.

disease and pregnant women. Please take action to prevent these outcomes.

My family has lived in the Illinois coal basin of Indiana, Illinois and Kentucky for more than 100 years while suffering from the well known air pollution. Indiana should be designated as non-attainment for sulfur dioxide (SO₂) pollution because evidence demonstrates that the Gibson coal-burning plant causes violations of the health-based 2010 SO₂ standard. As the Air modeling performed by the State of Indiana shows that actual emissions from the Gibson plant for 2012 to 2014 cause exceedances of the SO₂ standard set at 75 ppb. Sierra Club performed its own air modeling that confirms that the Gibson plant causes violations of the SO₂ standard. Gibson is a massive coal-burning plant and its scrubbers simply do not seem to be operating effectively. In 2014, for example, Gibson's SO₂ emissions rate was 0.254 lbs. SO₂/MMBTU. State-of-the-art scrubbers can achieve much lower, even at a retrofitted coal plant. Whatever Duke is doing to control SO₂ at Gibson, it is not as effective as can be achieved and nearby people deserve. I encourage the EPA to take prompt action to remedy the SO₂ pollution problem in Gibson County.

My name is Madame Misenard. I live on E. Maxwell Lane in Bloomington, Indiana. I am very concerned about the quality of the air that I breathe. I demand clean air in Indiana. I urge EPA to designate Gibson County, Indiana as non-attainment for sulfur dioxide (SO₂) pollution because overwhelming evidence demonstrates that the Gibson coal-burning plant causes violations of the health-based 2010 SO₂ standard. As the Air modeling performed by the State of Indiana shows that actual emissions from the Gibson plant for 2012 to 2014 cause exceedances of the SO₂ standard set at 75 ppb. Sierra Club performed its own air modeling that confirms that the Gibson plant causes violations of the SO₂ standard. Gibson is a massive coal-burning plant and its scrubbers simply do not seem to be operating effectively. In 2014, for example, Gibson's SO₂ emissions rate was 0.254 lbs. SO₂/MMBTU. State-of-the-art scrubbers can achieve much lower, even at a retrofitted coal plant. Whatever Duke is doing to control SO₂ at Gibson, it is not as effective as can be achieved and nearby people deserve. I encourage the EPA to take prompt action to remedy the SO₂ pollution problem in Gibson County.

increased level of pollution residents suffer.

The Indiana Department of Environmental Management is failing to live up to its mission to "implement federal and state regulations to protect the Posey County AB Brown power generating station. IDEM recently issued an order designating Posey County as in attainment for SO₂ emissions. IDEM's order fails to protect human health due to the basis that the order uses to set SO₂ emission limits from the AB Brown power generating station as in attainment will condemn members of my family, to a greater and needless health risk than what a stricter SO₂ emissions limit would provide. One cannot assume IDEM's modeling is accurate since IDEM failed to disclose any information in the final order about their modeling efforts. At least IDEM could have ordered an audit of the procedures and equipment at the AB Brown facility to independently verify if the installed scrubbers are working. This is the same captured regulation story that causes so much devastation in the health of our communities and to our most vulnerable populations. Ongoing tragedies such as the poisoning of water supplies in Flint, MI. Vectren officials even admit that Indiana has a very favorable regulatory environment. Vectren has known for many years that its AB Brown power plant would exceed the newer EPA SO₂ emissions threshold and even though Vectren chose to solve their SO₂ discharge problem by petitioning a utility friendly IDEM to simply issue a SO₂ discharge threshold they could not meet. Since Vectren has repeatedly failed to provide a reasonable SO₂ emission solution on its own, it is IDEM's duty and responsibility to work with Vectren to

A review of non attainment status for the Wagner and Brandon Shore plants since 1976 shows a consistent pattern of blatant abuse of EPA. 80% of Anne Arundel Counties population receiving the fall out from the power plants the medical cost is much higher than any electrical conversion to natural gas. This needs to happen now for the sake of acceptable air and water toxicity. The impact on Maryland State budget

As a private citizen residing in a county where sulfur dioxide emissions are occurring, I urge the Environmental Protection Agency to encourage poor air quality, particularly in economically disadvantaged and stressed communities in Anne Arundel County.

As a resident of the Stoney Beach Community, I am very concerned. Over the past several years I have developed Asthma and have had numerous

I am a concerned citizen of Baltimore. The statistics are alarming for the Raven powerplant. The SO₂ emissions are well over regulations.

The health of our children is in danger.

Asthma cases are the highest in the nation.

This is a direct cause from the SO₂ emissions.

The plant is not in compliance and therefore is breaking regulations.

This can be handled by the state but they have chosen not to.

We are becoming another Flint statistic.

Maybe this needs to be national so that changes can be made.

period of time rather than adhere to a strict 75 ppb standard for each hour. Therefore, the 44 ppb 1-hour maximum concentration is misinterpreted.

The Hogan administration in Maryland is currently resisting stricter regulations that would not allow power companies to average their SO₂ levels of emissions, that these power plants should adhere to stricter regulations, and that Ravens Power Holdings LLC be required to install scrubbers on the East Coast.

This is especially troubling because of the known harmful effects of SO₂ exposure. An array of adverse respiratory effects including bronchitis can lead to the formation of other SO_x (gaseous sulfur oxides), which can cause or worsen respiratory disease, such as emphysema and bronchitis, at risk.

The health costs are extremely high. According to Sierra Club estimates, Baltimore City's emergency room costs related to asthma were more than a grade F for smog. Up to 20 percent of Baltimore city children are diagnosed with asthma -- far beyond the national average.

We cannot sit by idly while our and our children's health are at risk for an old power technology. Coal is beyond its usefulness: The power plant is a health hazard. We should move toward stricter regulations to push the companies who own these plants to retire and dismantle them as quickly as possible.

I am an Arnold, Maryland resident who resides in an area that the EPA is declaring a Toxic SO₂ zone. I have been not only shocked but appalled. REALLY?! EPA recommend <2600 tons in a year. The nearby Brandon plant emits 3145 tons a year, and this is AFTER upgrades have implemented to bring the area to safe levels, citing acceptable average monthly levels. This is an extremely serious concern: I am a health care worker and see many people needing medications let alone the cost of their disease. Something must be done about these plants.

I am sick and tired of having breathing problems in the Glen Burnie area. Once a year I get slammed with a three month respiratory illness. I

I concur with the designation of Non-attainment for the parts of Baltimore and Anne Arundel counties so designated. The state needs further action to achieve attainment even though we experience increasing air quality alerts and residue on hard surfaces, including our cars.

I have lived and worked in the northern Anne Arundel and Curtis Bay area for over 35 years. The EPA should be more concerned with the emissions when these businesses turn up production processes above allowable limitations knowing that the bureaucratic federal offices are vacillating on the ground in the train yard in Curtis Bay between Patapsco Ave and Shell Road since I have observed since the late 1970s until I left the area illegally around Curtis Bay during zero dark hours from tractor trailer tankers then a high profile power station that keeps utilities affordable. Stoney Beach is the closest neighbor to this power plant -- all of our homes are within 1000 feet of its smokestacks. I'm very concerned about a limit that was carefully determined after multiple studies of the impact of sulfur dioxide on public health.

I do know that sulfur dioxide is a toxic gas and that it is a serious respiratory irritant and I also understand that the primary producers of sulfur dioxide gas in our area. I have seen sulfur dioxide density maps which clearly show that these plants are producing the bulk of the sulfur dioxide in the area. I call upon the EPA, the State of Maryland, and Raven Power to bring both of the power generation plants next to our community into full compliance. Irritation from sulfur dioxide occurs on the order of minutes and monthly averages are meaningless in terms of our health. Certainly coal is the problem. State of Maryland and Raven Power to act responsibly and consider alternative fuels that will protect the respiratory health of our community. We need to reduce their sulfur dioxide emissions so that our children are safe to play outside and that we're all safe inside our own homes. Finally, I ask for greater transparency in the area and alerts. Nothing is more important to our health than the air we breathe.

I would strongly suggest you follow your own laws and protect Anne Arundel County and the rest of Maryland from the toxic air we are experiencing. I am a Stoney Beach resident and I am very concerned about the people within a radius of the plant. Emitting 5 times higher than the allowed amount by the EPA enrages me, especially when profit is put over health. We have these sorts of issues if it can be prevented. Why is it that both companies, Raven Power Plant and the Wagner plant are getting away with this? They are about to move into a toxic air quality zone! We did! We have lived here since 2012 and have had a child since then. We will surely be even more concerned if something of the sort are the company owners going to cough up for putting thousands of people at risk or causing damage to our health?!!! I am sick and tired of continuing with producing the TOXIC SO₂!

we also learned that the wagner plant is the highest producer of sulfur dioxide on the entire east coast -- apparently because the owner of Shores plant owned by the same company was updated with sulfur dioxide scrubbers in 2010, but the Wagner plant was left untouched. For exceeding EPA regulatory sulfur dioxide limits. We can only assume with the combined extremely high levels of sulfur dioxide levels near their homes or filter it once its inside. Furthermore, we have no notification of high sulfur dioxide emission days from these plants. We understand protect our health.

We call upon the EPA, the State of Maryland, and Raven Power to bring both of the power generation plants next to our community into full compliance since lung irritation from sulfur dioxide occurs on the order of minutes and monthly averages are meaningless in terms of our health. Certainly. We urge the State of Maryland and Raven Power to act responsibly and consider alternative fuels that will protect the respiratory health of our children. We urge the plants reduce their sulfur dioxide emissions so that our children are safe to play outside and that we're all safe inside our own homes.

Finally, we ask for greater transparency and accountability for all stakeholders including real time notification on public websites about high sulfur dioxide days.

Please don't take a chance with our lungs and lives for money. Best to be on the conservative side and breath a sigh of relief. The Wagner plant is the highest producer of sulfur dioxide on the entire east coast.

Please reduce CO in Anne Arundel Co, MD

The "non-attainment" designation is appropriate, but entirely too meek and mild for the horror that is North Anne Arundel air.

These regulations are very carefully crafted and there is a lots of research behind it. The electric plants in brandon shore AA count MD are the worst. The corporations support ellected members and they once elected do not care about the public health. The electric rates have gone through the roof and got away with this most needed improvements. My message to Mr. Governor is that do what is right. SO2 will also destroy the bay area. The extra for electric bill now and upgrade the plants is a win win situation for all of us. Please do not convert us to a developing nation where the wagner Power Plant is the highest emitter of SO2 on the entire East Coast. The wagner plant emitted a total of 9,610 tons of sulfur dioxide in 2010. That is 1.15 lbs of SO2 per mmBTU (1 million British Thermal Units -- 1 BTU is the amount of energy required to heat a gallon of water 1 degree Fahrenheit). ANY technology to control its SO2 emissions.

Brandon Shores Plant Has Increased Emissions of SO2 Since 2010. Phase 1 SO2 controls were implemented under the Healthy Air Act of 2009. In 2010, SO2 emissions were 1,260 tons per year, and by 2014, Brandon Shores SO2 emissions had risen to 3,145 tons per year - exceeding acceptable standards. Both the Wagner and Brandon Shores Plants Contribute to Excessive SO2 Emissions. In 2011, emissions of SO2 amounted to 11,943 tons per year. The EPA believes, therefore, that a designation of nonattainment (i.e., emissions do not meet recommended health standards) within a 35.5 kilometer radius of the plant is warranted. Exposure to Emissions of SO2 Is a Serious Health Hazard. An array of adverse respiratory effects including bronchoconstriction and increased asthma attacks. SO2 is also an indicator for the larger group of gaseous sulfur oxides (SOX), as high concentrations of SO2 can lead to the formation of acid rain, and bronchitis, and can aggravate existing heart disease.

Health Costs Add Up to More than \$33 Million. Up to 20 percent of children living in Baltimore are diagnosed with asthma, and SO2 emissions are a major contributor. The cost of asthma treatment in Baltimore alone cost more than \$23 million in 2009. The American Lung Association gave Baltimore a grade F for smog.

We have lived in the Stoney Beach Condos for the past 4 years. Living next to this plant has been unpleasant. There is a boardwalk along the beach close to the plant, it makes me wonder what my family and I are breathing in. It wasn't until I read this article that I became extremely concerned. The neighborhood is safe and I don't think that is happening. PLEASE do something for our community so we don't have health issues down the road.

As a resident living within 3 miles of the Ameren Labadie power plant it is imperative that regulations improving air quality be enacted. I have a child with asthma to avoidable pollutants.

As a resident of Franklin County, I encourage the EPA to follow through with the designation of nonattainment for the Ameren, Labadie, Missouri. Adding scrubbers to stacks is not a new technology-it is an older, established technology. Questions about how to implement it, and the cost, have been figured in to ongoing planning for operations of this plant ages ago. The impact on air quality for an entire region has been researched. Since Ameren has chosen not to implement this technology, I believe that the EPA has an obligation, as the watchdog for the ordinary citizen, to require it.

As residents of Labadie, Missouri, air pollution (SO2 namely) discharged by the Ameren coal-burning power plant in our community has long been a problem. I urge the EPA to bring the plant into compliance, with a nonattainment designation, and modern scrubbers. The installation of modern pollution control scrubbers that can eliminate as much as 98% of the pollutants, (such as PM, SO2, heavy metals, etc.) is a proven technology.

I am a citizen living in Region 7. My family has a history of dealing with respiratory ailments that have not been life threatening but sometimes make it difficult to breathe. I realize we need electricity but please get some scrubbers installed on the Labadie power plant and help save the air. The scrubbers were supposed to have been installed years ago.

People who work at the plant park their vehicles under carports to protect the paint on the vehicles from the ash flying around day and night. Thanks for any help you can provide to put long term protections in place.

I am a Missouri citizen as well as an Eco-Tour provider in Saint Louis, writing about the excessive SO2 emissions from the Labadie Plant, in my blog. I urge the EPA to bring the plant into compliance, with a nonattainment designation, and modern scrubbers.

My customers are "Millennial" families with young children, who are much too busy to write, but I assure you they do not want cheaper electricity. We will scrub the air & water with money, technology and policy, or we will scrub the air & water with our bodies. Let's move forward with clean energy.

I am a resident of Labadie, MO and work in St. Albans, MO. Both areas are impacted by the air pollution coming from the AMeren Labadie scrubbers to attempt to clean the air as much as possible. I was grateful to learn the EPA has recently acknowledged Ameren's "nonattainment violations and require them to put in scrubbers to clean up their pollution as many other coal fired power plants have been required to do caused by the current high levels of SO2 due to the AMeren Labadie Power Plant. Please require Ameren to put scrubbers into their plant t Ameren Power Plant.

I am a resident of unincorporated St. Charles County, Missouri located within a air quality nonattainment area and I want EPA to stick to the largest coal-fired power plant - a plant that greatly impacts regional air quality.
The state would have to actively monitor compliance so that the air is clean to breathe. I am very concerned for myself and my family as p #Scrubbers would eliminate 98% of the sulfur dioxide and disease causing chemicals currently coming out of the plant and impacting the S Ameren's behavior is shameful and immoral of not criminal when it comes to avoiding steps needed to meet attainment in this area of the EPA has determined that Ameren is in violation of the new emission standards, under the Clean Air Act, and a designation of nonattainment

I am very much in favor of updating the SO2 Emissions Standards. Emissions from the Labadie, MO plant drift eastward so they affect a large expense for treatment. Cleaning up our air is of utmost importance. We must take every opportunity to reduce SO2 emissions.

I appreciate this opportunity to have my voice heard. EPA has been the bastion of environmental justice in this nation and with the Clean A here that the Air Quality regulation for one of the biggest power plants in the region, the Ameren Labadie Power plant, be upheld, and Am spend innumerable volunteer hours, managing and protecting the State's natural resources. As one of the biggest industries in the State, A resources for our future members. Making them comply with Air Quality regulations of this nation is not only morally appropriate but is also economic activity.

~~EPA must also aware of a threat of equal danger to the health of the community. That is the presence of SO2, another of the dangerous by~~
Tomich article in the St. Louis Post Dispatch showing a model of the dispersal plume of SO2 from the Labadie plant, citing the research by V I have reviewed the scientific and measurement reports as a reasonable and interested citizen. I want to go on record as a concerned citizen asthma, COPD, cardio-vascular disease, stroke, pre-mature births and death for vulnerable populations. The plume zone includes commun Labadie, St. Albans, Coleman. These children are put at risk of exposure to extremely high concentrations of SO2 during critical 5-minute b grandchildren grow up in the Villa Ridge and Wildwood areas extending from the Ameren Labadie plant. Both these areas exceed, that is, v Please act in the best interest of our family's health and the health of our neighbors. There is no price you can set on the cost of my family's motto, if you choose to honor it is: "Salus populi suprema lex esto " - The well-being of the people shall be the supreme law.

I live in Labadie Missouri and have for over 10 years. During this time I have become more aware of the dangerous pollutants emitted by th dust blowing in high winds, and the disposal of the coal ash waste into the water table [what most of us use as drinking water from wells]. you to keep the pressure on Ameren to not only provide reliable electricity, but to do so in a manner that respects the health and well-being have made it clear they support Ameren in all respects, regardless of the health dangers; and we are depending on the EPA to protect us. f for all you do to make our world a better place to live in.

I live in Labadie, MO. I know the Ameren power plant in Labadie exceeds the SO2 emissions standards. EPA has determined that Ameren is compliance. Ameren should be required to install the proper scrubbers and other equipment to significantly reduce SO2 emissions. Please,

I live in Labadie. I breath the air in Labadie. I know the Ameren power plant in Labadie exceeds the SO2 emissions standards. EPA, you have step by step clean up plan that would ensure compliance and a safer environment for everyone. That sounds like a great solution. Keep to political pressures or to corporate pressures, do the right thing! Thanks.

I live within a few miles of a the largest coal fired power plant in the state of Missouri, Ameren UE's power plant at Labadie, the 12th largest EPA's oversight is crucial. Ameren's SO2 emissions are in violation of the new emissions standards under the Clean Air Act. They have no so it's act. They will not do it on their own.

cancers. There are other power plants that have modern pollution controls that are able to reduce the emissions by approximately 98%. I v turn of the century for the beauty of the surrounding country side, is a dangerous place to live. I want to thank the EPA for saying that we c installed. Please protect us and know that my family and many other families in the area support this decision and are looking forward to t residents that are not able to utilize a computer or send information easily through this process and I would encourage you to speak with s the deliberations so we can all celebrate a day with a better chance at a healthy environment for all of us. We are counting on you to prote

My Father and My husbands father both died of heart disease we believe was related to the sulphur that the Labadie coal plant is emitting already.

Clean breathable air is a basic human right. My rights are being violated by Ameren's harmful emissions and blatant disregard for public health. It is critical that regulatory agencies such as the Department of Natural Resources work to ensure that our air is protected from harmful pollutants. I stand in support of EPA's proposal to reject DNR's unclassifiable sulfur dioxide designation and support EPA's proposal to declare the area around our region to protect public health.

For too long polluters in our state have had more power and say than Missouri families. Our health does not need to be sacrificed for our economy. In the future, I urge DNR to work to protect my health and well being, not Ameren's profits.

I applaud EPA's decision to reject DNR's faulty proposal and to protect our community's health.

~~Over 100,000 people live in the area surrounding the Labadie Power Plant, and the greater St. Louis region. According to Environmental Integrity Project, St. Louis ranks first in causing pollution-related premature deaths (140-290/yr) in the United States. Our community and the region have borne the brunt of a result, the Ameren Labadie Plant emits approximately 42,236 tons of SO2 yearly, per their reporting to EPA regulators.~~

Our organization, governed by a Board of Directors, on behalf of our supporters and the broader community support the EPA's preliminary recommended model. It is our understanding that Ameren does not have adequate monitoring data (3 years) to support a designation based on health designations. We call on the EPA to stand by its scientific and technical determination and require the State of Missouri and Ameren to protect public health by writing and enforcing regulations based on laws passed by Congress," having already announced that Ameren is noncompliant with federal requirements.

Thank you EPA Region 7 for designating the area around the Labadie Power Plant as having reached non-attainment in its current levels of sulfur dioxide. In my understanding that scrubber technology available since the 1970's and installed on countless other power plants in the nation could reduce emissions miles of the power plant, I support your decision to override the MO State designation, look forward to the definitive announcement by our EPA Region 7.

The pollutants of sulfur dioxide created by the Labadie Coal Plant to St. Charles County residents was brought to our attention by a group of concerned citizens. We will be made to ensure Ameren is responsible and being held accountable for installing whatever equipment is available, scrubbers were mentioned. St. Charles County residents and the surrounding area is being closely monitored. If I can be of any assistance, please do not hesitate to contact me.

We support the designation of Franklin County Missouri (Labadie Power Plant) as a nonattainment area in need of a clean up plan with standards.

Recently, over 1300 Sierra Club members and supporters in Texas submitted personal comments to Administrator McCarty in support of EPA's decision. Attached and incorporated herein for deposit into the regulations.gov docket and for consideration by you and your staff as part of this administrative process. It is imperative for the health of the communities near these plants that EPA finalize these non-attainment designations and take another step to protect public health.

As someone with asthma, I need the air to be as clean as possible to help me moderate my symptoms, reduce my discretionary use of medication. I am not the only one with this or other air-quality associated troubles in my town and metro area, so consider this comment multiplied by the dozens.

Clean, clear, healthy air is needed and has been needed for a long time.

EPA Re 7 AMEREN MUST CLEAN UP THEIR EMISSIONS!

Hold Ameren to the law and do the right thing for future generations. Know that we borrow this earth from our children, and know that we have a responsibility to protect it.

I am an atmospheric scientist. I work at NCAR, but these comments are my own personal opinion.

I have analyzed the data and reports that were independently commissioned by the Sierra Club. I am aware of the region's climatology and topography, and I know that SOx concentrations far exceed safe levels.

There is no reasonable scientific justification to avoid the conclusion that the air quality is out of compliance with our Clean Air standards.

Describing this region as "non-classifiable" is cowardly and scientifically dishonest.

I support clean air!

It would be a gross miscreance to allow our health to be compromised by classifying the air quality standards "attainment."

Clearly, the dirty air and health risks are severe, and need much work toward mitigation. Non-attainment is an understatement.

Of course this area should be registered as a non-attainment area. Furthermore this designation should be made public and put in the new regulations.

Please respect the will of the people. We want clean air and a serious effort to halt climate change. Thank you

Pollution matters. Many of us have tremendously busy lives with family and job responsibilities. We may not have time to look into the politics of it. As a voting citizen, I want you to know that the environment is my #1 voting concern. The long term habitability of the planet is at stake, so all of our voices for denial is strong. How strong is yours? How long will it allow you to ignore your contribution to the degradation of the earth that we will live on?

There are alternatives now, so there is no excuse for poisoning people anymore. Rights to clean air should trump these companies rights.

From Klafka Document

SO2 Modeling Results for Martin Drake Power Plant Modeling Analysis

	Impact	Background	Total
Allowable	567.5	75.9	643.4
Actual	1585.3	75.9	1661.2

Modeled SO2 Emissions from Martin Drake Power Plant

Stack ID	Unit ID	Allowable Emissions 30-day Average (lbs/hr)	g/s
S05	5	142.5	17.95
S06	6	111.9	14.10
S07	7	173.7	21.89
Stack Total		428.1	

hour NAAQS for SO2

Acceptable Impact (NAAQS - Background) 99th Percentile 1-hour Daily Max (µg/m3)	Required Total Facility Reduction Based on Allowable Emissions (%)	Required Total Facility Emission Rate (lbs/hr)	Required Total Facility 1-hour Average Emission Rate (lbs/mmbtu)
120.3	81	32.4	0.02

FROM DR GRAY attachment

Klafka's Source Data Allowable

	SO2 Emissions (g/s)
Unit 5	17.95
Unit 6	14.1
Unit 7	21.88

Klafka's Actual SO2 Emission Rates (based on hourly data), 2012-2014

	3-Year Average (g/s)	Max 1-Hour Average (g/s)
5	22.7	64.2
6	43.6	104.3
7	56.6	152.8
All Units	122.9	294.3

Barrett's Source Data

	SO2 Emissions (g/s)
Unit 5	variable
Unit 6	variable
Unit 7	variable

Barrett's Actual SO2 Emission Rates (based on hourly data), 2011-2013

	3-Year Average (g/s)	Max 1-Hour Average (g/s)
5	30.1	65.9
6	47.4	104.4
7	66.6	173.8
All Units	144.1	307.2

AERMOD Results: Modeled Design Value Concentrations (µg/m3)

Including Building Downwash	Impact Location	No building downwash
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Unit 5	Urban	259.8	(0.1 km ENE)	17.9
	Rural	258.7	(0.1 km ENE)	200.2
Unit 6	Urban	140	(0.1 km ENE)	11.2
	Rural	138.8	(0.1 km ENE)	111.6
Unit 7	Urban	27	(0.75 km ESE)	13.8
	Rural	72.9	(7.5 km S)	126.8
All Units	Urban	399.4	(0.1 km ENE)	41.2
	Rural	395.3	(0.1 km NNE)	368

w/ downwash

w/out downwash

Unit 6 and 7

Urban

Rural

139.6 (0.1 km ENE)

n/a

background concentration
must be below this number
56.4 to pass

99th percentile average for
15 CAMP, La Casa, Welby
(these monitors would be
urban influenced)

NAAQS $\mu\text{g}/\text{m}^3$	
	196.2
	196.2

*actual data measured emissions from 1/1/12-12/31/14

*background from Adams County - lowest background conc. In state

Impact Location

(0.3 km NNW)
(3 km WSW)
(0.5 km NNW)
(5 km SW)
(2 km W)
(5 km WNW)
(0.5 km NNW)
(5 km SW)